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January 18, 2017

VIA ECF

Honorable Douglas E. Arpert, U.S.M.J.
Clarkson S. Fisher Federal Building & United States Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: Bhatt v. AT&T Inc., et al.
Civil Action No. 3:16-cv-03715-MAS-DEA

Dear Judge Arpert:

This firm represents defendants Planet Associates, Inc. and Christopher Healy in the above referenced matter.

The Summons and Complaint were purportedly served on these defendants on December 30, 2016. Assuming valid service, the defendants' time to answer, move or otherwise respond to Plaintiff's 396-paragraph *pro se* Complaint therefore expires on January 23, 2017. Given the length and complexity of the Complaint, defendants seek a 30-day extension to file their response.

Other defendants have been granted similar extensions for similar reasons. Plaintiff, therefore, will not be prejudiced by the extension. Moreover, the Court has not yet completed the *sua sponte* screening process for this *in forma pauperis* matter.

On January 17, 2017, I emailed plaintiff to ask for her consent to this extension of time; she did not reply.

We thank the Court for its consideration.

Respectfully submitted,

/s/Shalom D. Stone
Shalom D. Stone

SDS:lk

cc: Chaula Bhatt (via ECF, and regular mail)
Counsel of Record (via ECF)